

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER FREEMAN,

Plaintiff,

v.

STAKE.COM, PRIMEDICE, EDWARD
CRAVEN, BIJAN TEHRANI, SLICEMEDIA
B.V., MEDIUM RARE N.V., EASYGO
SOLUTIONS PTY LTD, MEBIT.IO, AND
MLADEN VUČKOVIĆ.

Defendants.

Case No. 22-CV-7002 (RA)

**DECLARATION OF BIJAN TEHRANI IN SUPPORT OF DEFENDANTS' MOTION TO
DISMISS COMPLAINT**

I, BIJAN TEHRANI, hereby declare as follows:

1. I am a co-founder of Primedice and am involved with the website that operates under the name Stake.com. I make this declaration in support of Defendants' motion to dismiss. I have personal knowledge of the facts set forth below and if called as a witness I could and would testify competently to those facts.

2. I am a United States citizen residing in Australia. I moved to New York in the summer of 2015 but remained a Connecticut resident through that year. In 2016, I was a resident of New York until I moved to Australia in August 2016.

Primedice

3. Primedice is an online dice game. The Primedice website is designed not to be accessible in New York and other areas of the United States. The blocking of access for New York users described in the Declaration of David McGill has been in place since at

least 2014.

4. Primedice is not and was not incorporated in New York. It did not and does not own property in New York, have offices in New York, or have bank accounts in New York.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: February 9, 2023
Melbourne, Australia

By:

Bijan Tehrani

A handwritten signature in black ink, appearing to read 'Bijan', is written over a horizontal line. The signature is stylized with a large 'B' and a long, sweeping tail.